

# **EXHIBIT “A”**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

REYNOLD B. SILAS,

Index No.:

Plaintiff,

Date Purchased:

-against-

SUMMONS

THE CITY OF NEW YORK;  
THE NEW YORK CITY POLICE DEPARTMENT;  
DETECTIVE "JOHN DOE" (SHIELD #UNKNOWN)  
Individually and in his Official Capacity;  
THE CITY OF YONKERS;  
THE CITY OF YONKERS POLICE DEPARTMENT;  
DETECTIVE CAVE OF THE CITY OF YONKERS  
POLICE DEPARTMENT (SHIELD #UNKNOWN)  
Individually and in his Official Capacity;  
THE HOME DEPOT, INC. D/B/A HOME DEPOT; and  
HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT,

**To the Above-Named Defendants:**

**YOU ARE HEREBY SUMMONED** to answer the Verified Complaint in this action and to serve a copy of your answer, or, if the Verified Complaint is not served with this Summons, to serve a Notice of Appearance, on the plaintiff or plaintiff's attorney(s), within twenty (20) days after the service of this Summons, exclusive of the day of service (or within thirty (30) days after the service is complete, if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Verified Complaint.


Plaintiff designates Kings County as the place of trial.

The basis of the venue is the Plaintiff's residence.

SUMMONS REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

1 Plaintiff resides at 1295 Park Place, Brooklyn, New York 11213. Dated this 31st day of October,  
2 2018.

3 Dated: Queens, New York  
4 October 31, 2018

  
LAW OFFICE OF FARID AHMED  
Attorney for Plaintiff  
REYNOLD B. SILAS  
37-66 72nd Street, 3rd Floor  
Jackson Heights, NY 11372  
Tel: (718) 928-9991  
Fax: (718) 764-4327

9 **DEFENDANTS' ADDRESS(ES):**

10 THE NEW YORK CITY POLICE DEPARTMENT  
11 Defendant

12 THE COMPTROLLER OF THE CITY OF NEW YORK  
13 One Centre Street, Room 1225  
14 New York, NY 10007

15 DETECTIVE "JOHN DOE" (SHIELD #UNKNOWN)  
16 Individually and in his Official Capacity  
17 Defendant

18 THE COMPTROLLER OF THE CITY OF NEW YORK  
19 One Centre Street, Room 1225  
20 New York, NY 10007

21 THE CITY OF YONKERS POLICE DEPARTMENT  
22 Defendant

23 THE CORPORATION COUNSEL  
24 THE CITY OF YONKERS  
25 40 South Broadway  
26 Yonkers, New York 10701

27 DETECTIVE CAVE OF THE CITY OF YONKERS POLICE DEPARTMENT  
28 (SHIELD #UNKNOWN) Individually and in his Official Capacity  
Defendant

THE CORPORATION COUNSEL  
THE CITY OF YONKERS  
40 South Broadway  
Yonkers, New York 10701

THE HOME DEPOT, INC. D/B/A HOME DEPOT  
Defendant

SUMMONS REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

FILED: KINGS COUNTY CLERK 11/01/2018 06:57 PM

INDEX NO. 522086/2018

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 11/02/2018

1 2455 Paces Ferry Road, NW  
2 Atlanta, GA 30339

3 HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT  
4 Defendant  
5 601 South Sprain Road  
6 Yonkers, New York 10710.  
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SUMMONS REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

## VERIFICATION

STATE OF NEW YORK)

..ss.:

COUNTY OF QUEENS )

I, the undersigned, being duly sworn, deposes and say: I am the Plaintiff in the action; I have read the foregoing VERIFIED COMPLAINT and know the contents thereof; and the same is true to my own knowledge. The grounds of my belief as to all matters not stated upon my knowledge are as follows: BOOKS, RECORD AND DOCUMENTS.



REYNOLD B. SILAS

Sworn to before me on the  
31<sup>st</sup> day of October, 2018



NOTARY PUBLIC

**CHANDRA WHALEN**  
Notary Public, State of New York  
No. 02WH0263545  
Qualified in New York County  
Commission Expires August 10, 2020

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

REYNOLD B. SILAS,

Index No.:

Plaintiff,

Date Purchased:

-against-

VERIFIED COMPLAINT

THE CITY OF NEW YORK;  
THE NEW YORK CITY POLICE DEPARTMENT;  
DETECTIVE "JOHN DOE" (SHIELD #UNKNOWN)  
Individually and in his Official Capacity;  
THE CITY OF YONKERS;  
THE CITY OF YONKERS POLICE DEPARTMENT;  
DETECTIVE CAVE OF THE CITY OF YONKERS  
POLICE DEPARTMENT (SHIELD #UNKNOWN)  
Individually and in his Official Capacity;  
THE HOME DEPOT, INC. D/B/A HOME DEPOT; and  
HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT,

Plaintiff REYNOLD B. SILAS, ("Plaintiff") by and through his attorney, Farid Ahmed Esq., as and for his Complaint, alleges upon knowledge, information and/or belief as follows:

### PRELIMINARY STATEMENT AND FACTUAL ALLEGATION

1. This is a civil action seeking monetary relief against Defendants THE CITY OF NEW YORK; THE NEW YORK CITY POLICE DEPARTMENT; DETECTIVE "JOHN DOE" (SHIELD #UNKNOWN) Individually and in his Official Capacity; THE CITY OF YONKERS; THE CITY OF YONKERS POLICE DEPARTMENT; DETECTIVE CAVE OF THE CITY OF YONKERS POLICE DEPARTMENT (SHIELD #UNKNOWN) Individually and in his Official Capacity; THE HOME DEPOT, INC. D/B/A HOME DEPOT; and HOME DEPOT U.S.A., INC., for committing acts of false arrest, false imprisonment, negligent detention, excessive detention, negligent infliction of emotional distress, intentional infliction of emotional distress, battery, menacing, harassment, excessive force, police brutality, negligent

VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

1 hiring/training/retention, negligence, gross negligence, reckless disregard, abuse of process,  
 2 municipal liability, malicious prosecution, violation of rights protected under the United States  
 3 Constitution, violation of rights protected under the Constitution of the State of New York,  
 4 violation of civil rights under 42 USC Section 1983.  
 5

6 2. Specifically, Plaintiff alleges that Defendants (collectively and individually)  
 7 wrongfully deprived him of his constitutional rights and committed acts of false arrest, false  
 8 imprisonment, negligent detention, excessive detention, negligent infliction of emotional  
 9 distress, intentional infliction of emotional distress, battery, menacing, harassment, excessive  
 10 force, police brutality, negligent hiring/training/retention, negligence, gross negligence, reckless  
 11 disregard, abuse of process, municipal liability, malicious prosecution, violation of rights  
 12 protected under the United States Constitution, violation of rights protected under the  
 13 Constitution of the State of New York, violation of civil rights under 42 USC Section 1983.  
 14  
 15

16 3. The items of damage or injuries Plaintiff REYNOLD B. SILAS suffered are:

17 Plaintiff REYNOLD B. SILAS suffered pain, suffering, physical injury, loss of  
 18 earnings, loss of enjoyment of life, loss of freedom, emotional distress, mental anguish, shame,  
 19 humiliation, indignity, damage to reputation, and incurred monetary costs and other damages.  
 20 Claim exceeds \$10,000,000.00 in damages, including, but not necessarily limited to,  
 21 compensatory damages, punitive damages, general damages, special damages, damages under 42  
 22 U.S.C Section 1983, and attorney fees. The Plaintiff also seeks permanent injunctive relief  
 23 against the respondents related to their conduct.  
 24  
 25  
 26  
 27

## 28 JURISDICTION AND VENUE

VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

RECEIVED NYSCEF: 11/02/2018

1           10.     The Defendant, THE HOME DEPOT, INC. D/B/A HOME DEPOT is a foreign  
2 corporation, with a headquarter at 2455 Paces Ferry Road, NW, Atlanta, GA 30339, and upon  
3 information and belief, is authorized to do business in the State of New York, and is operating  
4 HOME DEPOT store at 601 South Sprain Road, Yonkers, New York 10710.  
5

6           11.     The Defendant, HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT is a foreign  
7 business Delaware corporation, authorized to do business in the State of New York, and operates  
8 a HOME DEPOT store at 601 South Sprain Road, Yonkers, New York 10710.  
9

10          12.     At all times hereinafter mentioned, THE CITY OF NEW YORK and THE CITY  
11 OF YONKERS maintained a police department.  
12

13          13.     A Notice of Claim was served upon THE CITY OF NEW YORK; THE CITY OF  
14 YONKERS; THE NEW YORK CITY POLICE DEPARTMENT; and THE CITY OF  
15 YONKERS, on May 3, 2018, by certified mail, return receipt requested, within 90 days of the  
16 occurrence and/or accrual of the causes of action.  
17

18          14.     More than 30 days have elapsed since presentation of the claim, and THE CITY  
19 OF NEW YORK; THE CITY OF YONKERS; THE NEW YORK CITY POLICE  
20 DEPARTMENT; and THE CITY OF YONKERS, have failed to adjust and/or dispose of the  
21 claim presented therein.  
22

23          15.     This action is commenced within one year and 90 days of the date of the incident  
24 and/or accrual of the cause of action.  
25

26          16.     The limitations on liability set forth in CPLR 1601 do not apply to this action.  
27

28          17.     The limitations on liability set forth in CPLR 1601 do not apply to this action by  
reason of one or more of the exemptions set forth in CPLR 1602.

VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

FIRST CAUSE OF ACTION

18. Plaintiff REYNOLD B. SILAS, went to the Defendants', THE HOME DEPOT, INC. D/B/A HOME DEPOT; and HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT, store known and located at HOME DEPOT, 601 South Sprain Road, Yonkers, New York 10710, for purchasing electrical materials. Thereafter, upon the complaint of the manager and/or supervisor and/or other employee of the Defendants, THE HOME DEPOT, INC. D/B/A HOME DEPOT; and HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT, whose identity will be revealed during the discovery process, called THE CITY OF YONKERS POLICE DEPARTMENT, accusing Plaintiff of identity theft. Plaintiff was arrested around December 23, 2015. At that time the Plaintiff was kept at the precinct and was released after 1 hour.

19. The Defendant CITY OF YONKERS POLICE DEPARTMENT called the Plaintiff months later and informed him that the Defendant THE CITY OF YONKERS POLICE DEPARTMENT intent to issue a warrant of his arrest, but nobody came to arrest the Plaintiff REYNOLD B. SILAS.

20. That on July 18, 2017 Plaintiff REYNOLD B. SILAS was pulled over by the Defendant, THE NEW YORK CITY POLICE DEPARTMENT in Kings County, Borough of Brooklyn and he was accused of failure to signal while changing lanes. At that time Plaintiff was informed of a warrant of his arrest in Yonkers. Thereafter, the Plaintiff was processed by THE NEW YORK CITY POLICE DEPARTMENT through the Central Booking in the Borough of Brooklyn. Plaintiff REYNOLD B. SILAS was charged with "driving with a suspended license" and he plead guilty and paid a \$75 fine and \$85 surcharge. One hour later, THE NEW YORK CITY POLICE DEPARTMENT came and picked him up. Plaintiff

VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

1 REYNOLD B. SILAS was incarcerated and was accused of identity theft, opening a credit  
2 card in one "Michael Hazan" name and stealing \$8,000. Plaintiff REYNOLD B. SILAS was  
3 later released on \$50,000 bail.  
4

5 21. While in prison, Plaintiff REYNOLD B. SILAS was put in solitary  
6 confinement for one week after he was incorrectly diagnosed with tuberculosis. Further, for  
7 about one week, the Plaintiff REYNOLD B. SILAS was not allowed to make a phone call to  
8 his family.  
9

10 22. The charges leveled against the Plaintiff REYNOLD B. SILAS were New York  
11 Penal Law Section 190.80 (D Felony), under Yonkers City Docket Number #16-1552-S. These  
12 charges were ultimately dismissed on February 5, 2018, by the Hon. Edward J. Gaffney, Judge of  
13 the Yonkers City Court. The seriousness of the charges caused the Plaintiff's REYNOLD B.  
14 SILAS family to expend approximately \$3,260.00 for bail premium and other costs associated  
15 with it.  
16  
17  
18

19 23. Alleged violations as a result are, negligent detention, excessive detention,  
20 negligent infliction of emotional distress, intentional infliction of emotional distress, menacing,  
21 harassment, police brutality, negligent hiring/training/retention, negligence, gross negligence,  
22 reckless disregard, abuse of process, municipal liability, violation of rights protected under the  
23 United States Constitution, violation of rights protected under the Constitution of the State of  
24 New York, violation of civil rights under 42 USC Section 1983.  
25  
26

27 24. That as a result of the foregoing, the Plaintiff REYNOLD B. SILAS suffered pain,  
28 suffering, physical injury, loss of earnings, loss of enjoyment of life, loss of freedom, emotional  
VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

distress, mental anguish, shame, humiliation, indignity, damage to reputation, and incurred monetary costs and other damages. Claim exceeds \$10,000,000.00 in damages, including, but not necessarily limited to, compensatory damages, punitive damages, general damages, special damages, damages under 42 U.S.C Section 1983, and attorney fees. Plaintiff also seeks permanent injunctive relief against the respondents related to their conduct.

# SECOND CAUSE OF ACTION

25. Plaintiff repeats, reiterates and re-alleges the allegations contained in paragraphs 1 through 24 herein as if more fully set forth at length.

26. Plaintiff REYNOLD B. SILAS was, without cause or provocation, falsely arrested and prosecuted upon the complaint of the defendants: THE CITY OF NEW YORK; THE NEW YORK CITY POLICE DEPARTMENT; DETECTIVE "JOHN DOE" (SHIELD #UNKNOWN) Individually and in his Official Capacity; THE CITY OF YONKERS; THE CITY OF YONKERS POLICE DEPARTMENT; DETECTIVE CAVE OF THE CITY OF YONKERS POLICE DEPARTMENT (SHIELD #UNKNOWN) Individually and in his Official Capacity; THE HOME DEPOT, INC. D/B/A HOME DEPOT; and HOME DEPOT U.S.A., INC.

27. As a result of the foregoing, plaintiff REYNOLD B. SILAS sustained other consequential damages.

28. As a result of the foregoing, Plaintiff REYNOLD B. SILAS has been damaged in excess of the jurisdictional limits of all lower courts in which this action could otherwise have been brought.

VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

1 THIRD CAUSE OF ACTION

2  
3 29. Plaintiff repeats, reiterates and re-alleges the allegations contained in paragraphs 1  
4 through 28 herein as if more fully set forth at length.

5  
6 30. The aforementioned occurrence took place by reason of the negligence of the  
7 Defendants THE CITY OF NEW YORK; THE NEW YORK CITY POLICE DEPARTMENT;  
8 DETECTIVE "JOHN DOE" (SHIELD #UNKNOWN) Individually and in his Official Capacity;  
9 THE CITY OF YONKERS; THE CITY OF YONKERS POLICE DEPARTMENT;  
10 DETECTIVE CAVE OF THE CITY OF YONKERS POLICE DEPARTMENT (SHIELD  
11 #UNKNOWN) Individually and in his Official Capacity; THE HOME DEPOT, INC. D/B/A  
12 HOME DEPOT; and HOME DEPOT U.S.A., INC., and their agents, servants and/or employees,  
13 including the police officers whose identity at present is not known to the Plaintiff.  
14  
15

16 31. As a result of the foregoing, plaintiff REYNOLD B. SILAS sustained other  
17 consequential damages.  
18

19 32. As a result of the foregoing, plaintiff REYNOLD B. SILAS was damaged in  
20 excess of the jurisdictional limits of all lower courts in which this action could otherwise have  
21 been brought.  
22

23 FOURTH CAUSE OF ACTION

24  
25 33. Plaintiff repeats, reiterates and re-alleges the allegations contained in paragraphs 1  
26 through 32 herein as if more fully set forth at length.

27  
28 34. The Defendants, THE CITY OF NEW YORK; THE NEW YORK CITY  
POLICE DEPARTMENT; DETECTIVE "JOHN DOE" (SHIELD #UNKNOWN) Individually  
VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

1 and in his Official Capacity; THE CITY OF YONKERS; THE CITY OF YONKERS POLICE  
2 DEPARTMENT; DETECTIVE CAVE OF THE CITY OF YONKERS POLICE  
3 DEPARTMENT (SHIELD #UNKNOWN) Individually and in his Official Capacity; THE  
4 HOME DEPOT, INC. D/B/A HOME DEPOT; and HOME DEPOT U.S.A., INC., City  
5 maliciously prosecuted criminal charges against plaintiff REYNOLD B. SILAS.  
6

7 35. As a result of the foregoing, plaintiff REYNOLD B. SILAS other consequential  
8 damages.  
9

10 36. As a result of the foregoing, plaintiff REYNOLD B. SILAS has been damaged in  
11 excess of the jurisdictional limits of all lower courts in which this action could otherwise have  
12 been brought.  
13

14 FIFTH CAUSE OF ACTION  
15

16 37. Plaintiff repeats, reiterates and re-alleges the allegations contained in paragraphs  
17 1 through 36 herein as if more fully set forth at length.  
18

19 38. The aforementioned occurrence constituted an invasion of the privacy of plaintiff  
20 REYNOLD B. SILAS.  
21

22 39. As a result of the foregoing, plaintiff REYNOLD B. SILAS sustained other  
23 consequential damages.  
24

25 40. As a result of the foregoing, plaintiff REYNOLD B. SILAS has been damaged in  
26 excess of the jurisdictional limits of all lower courts in which this action could otherwise have  
27 been brought.  
28

SIXTH CAUSE OF ACTION

VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

1 41. Plaintiff repeats, reiterates and re-alleges the allegations contained in paragraphs 1  
2 through 29 herein as if more fully set forth at length.

3  
4 42. As a result of the aforementioned occurrence, plaintiff REYNOLD B. SILAS was  
5 deprived of his civil rights under the Constitution of the State of New York and the Constitution  
6 of the United States, as well as other State ordinances statutes, codes and rules, including 42  
7 U.S.C.A. §§ 1981, 1983, 1985 and 28 U.S.C.A. § 1343.  
8

9 43. As a result of the foregoing, plaintiff REYNOLD B. SILAS sustained  
10 consequential damages.  
11

12 44. As a result of the foregoing, plaintiff REYNOLD B. SILAS has been damaged in  
13 excess of the jurisdictional limits of all lower courts in which this action could otherwise have  
14 been brought herein.  
15

16 SEVENTH CAUSE OF ACTION  
17

18 45. Plaintiff repeats, reiterates and re-alleges the allegations contained in paragraphs 1  
19 through 29 herein as if more fully set forth at length.  
20

21 46. As a result, the Plaintiff was arrested and prosecuted.  
22

23 47. That on or about December 23, 2015, the Defendants THE HOME DEPOT, INC.  
24 D/B/A HOME DEPOT; and HOME DEPOT U.S.A., INC., and its agents and employees,  
25 managing and operating HOME DEPOT store at 601 South Sprain Road, Yonkers, New York  
26 10710, made a complaint with the Yonkers Police Department charging the Plaintiff, REYNOLD  
27 B. SILAS, willfully and maliciously and unlawfully accusing Plaintiff of stealing identity and he  
28 was arrested around December 23, 2015.

VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

1           48.     The charges leveled against the Plaintiff REYNOLD B. SILAS were New York  
2     Penal Law Section 190.80 (D Felony), under Yonkers City Docket Number #16-1552-S. These  
3     charges were ultimately dismissed on February 5, 2018, by the Hon. Edward J. Gaffney, Judge of  
4     the Yonkers City Court.  
5

6  
7           49.     That each of the Defendants was wrongful, malicious and designed to embarrass  
8     and damage Plaintiff.  
9

10          50.     Plaintiff suffered extreme mental and emotional anguish as a result of the  
11     Defendants' wrongful actions. In addition, the Plaintiff suffered loss of wages as a result of  
12     Defendants' deliberate and malicious conduct.  
13

14          51.     Plaintiff suffered harm to his reputation, humiliation, embarrassment, mental  
15     anguish, etc., by being arrested and incarcerated on the false charge brought by the complaint of  
16     the Defendants, THE HOME DEPOT, INC. D/B/A HOME DEPOT; and HOME DEPOT  
17     U.S.A., INC., and its agents and employees, managing and operating HOME DEPOT store at  
18     601 South Sprain Road, Yonkers, New York 10710.  
19  
20

21          52.     Plaintiff would show that action of Defendants herein reflects a malicious,  
22     intentional, willful, reckless disregarded of the rights of Plaintiff herein and warrant an award of  
23     punitive damages to Plaintiff.  
24

25  
26          53.     Plaintiff would show intentional acts of Defendants constitute malicious  
27     prosecution, false imprisonment, false arrest, intentional infliction of emotional distress and libel  
28     and slander and the Plaintiff is entitled to judgment in his favor and against the Defendant for  
  
VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

1 compensatory and punitive damages.

2  
3 WHEREFORE, plaintiffs demand judgment against defendants, THE CITY OF NEW  
4 YORK; THE NEW YORK CITY POLICE DEPARTMENT; DETECTIVE "JOHN DOE"  
5 (SHIELD #UNKNOWN) Individually and in his Official Capacity; THE CITY OF YONKERS;  
6 THE CITY OF YONKERS POLICE DEPARTMENT; DETECTIVE CAVE OF THE CITY OF  
7 YONKERS POLICE DEPARTMENT (SHIELD #UNKNOWN) Individually and in his Official  
8 Capacity; THE HOME DEPOT, INC. D/B/A HOME DEPOT; and HOME DEPOT U.S.A.,  
9 INC., on each of the aforementioned Causes of Action in an amount in excess of the  
10 jurisdictional limits of all lower courts in which this action could otherwise have been brought,  
11 as follows:  
12

13  
14 a) Compensatory damages;

15 b) Punitive damages;

16 c) Award costs of this action including attorneys' fees to the Plaintiff;

17 d) Any such other and further relief as this Court may deem appropriate.

18 together with the costs and disbursements of this action.  
19  
20  
21  
22

23  
24 Dated: Queens, New York  
25 October 31, 2018

26  
27  
28  
  
LAW OFFICE OF FARID AHMED  
Attorney for Plaintiff  
REYNOLD B. SILAS  
37-66 72nd Street, 3rd Floor  
Jackson Heights, NY 11372  
Tel: (718) 928-9991  
Fax: (718) 764-4327

VERIFIED COMPLAINT REYNOLD B. SILAS VS. THE CITY OF NEW YORK, ET AL.,

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COUNTY OF KINGS**

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THE CITY OF YONKERS POLICE DEPARTMENT;  
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POLICE DEPARTMENT (SHIELD #UNKNOWN)  
Individually and in his Official Capacity;  
THE HOME DEPOT, INC. D/B/A HOME DEPOT; and  
HOME DEPOT U.S.A., INC. D/B/A HOME DEPOT,**

**Defendants.**

**SUMMONS AND VERIFIED COMPLAINT**

***LAW OFFICE OF FARID AHMED***

**Attorney for Plaintiff**

**REYNOLD B. SILAS**

**37-66 72nd Street, 3rd Floor**

**Jackson Heights, NY 11372**

**Tel: (718) 928-9991**

**Fax: (718) 764-4327**

**Certification pursuant to Section 130-1.1(a) of the Rules of the Chief  
Administrator of the Courts.**

  
**FARID AHMED, ESQ.**